



(Original submission 9-26-2024: Updated 2-18-2026)

Robocall Mitigation Plan

This robocall mitigation plan is for Pennsylvania Telephone Company, with headquarters at 191 Middle Road, Jersey Shore, PA 17740.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users

Pennsylvania Telephone Company has not been prohibited from filing a certification in the Robocall Mitigation Database.

Pennsylvania Telephone Company does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Pennsylvania Telephone Company uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

We validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

STIR/SHAKEN

We use partial STIR/SHAKEN implementation and the STIR/SHAKEN authentication framework on a portion of our network and all calls it originates on that portion of its network are compliant with 47 CFR § 64.6301(a) and (b).

Submitted by:

A handwritten signature in black ink, appearing to read 'RM', is positioned above the printed name of the signatory.

Richard Maietta

Vice President and General Manager

Pennsylvania Telephone Company